

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JUAN MENDOZA,

Plaintiff,

v.

Case No.: 1:10-cv-00798-SS

KASWISH KREATIONS, LLC.
and BHARAT MEHTA,

Defendants.

**PLAINTIFF'S POTENTIAL WITNESSES, TESTIFYING EXPERTS
AND PROPOSED TRIAL EXHIBITS**

Pursuant to the Court's Scheduling Order, Plaintiff, Jesus Mani, hereby designates the following potential witnesses, potential expert witnesses, and proposed trial exhibits:

Plaintiff's Potential Witnesses:

1. Juan Mendoza, Plaintiff
Knowledge of the facts and circumstances surrounding Plaintiff's claims against the Defendants.
2. Nicholas Nino
(254) 733-9465 - Telephone
Mr. Nino has knowledge of the hours worked and job duties preformed by Plaintiff.
3. Luis Alvarez
(512) 563-0492 - Telephone
Mr. Alvarez has knowledge of the hours worked and job duties preformed by Plaintiff.
4. Bharat Mehta, Defendant
c/o Todd A. Prins
Prins Law Firm

4940 Broadway, Ste. 108

San Antonio, TX 78209

Mr. Mehta has knowledge of the hours worked and job duties preformed by Plaintiff.

5. Any witnesses listed by Defendant
6. Witnesses necessary for impeachment or rebuttal

Potential Expert Witnesses:

1. Charles L. Scalise
Ross Law Group

Plaintiff's Proposed Trial Exhibits:

1. Plaintiff's pay stubs;
2. Plaintiff's time cards
3. All exhibits identified by Defendant;
4. All exhibits necessary for impeachment or rebuttal purposes;

As it is early in the discovery process, and a substantial portion of potential trial exhibits are in the possession of the Defendants and have not yet been produced, Plaintiff reserves the right to supplement this list of proposed trial exhibits and witnesses pursuant to the court's scheduling order and pursuant to the Federal Rules of Civil Procedure.

Respectfully submitted,

ROSS LAW GROUP

1104 San Antonio Street

Austin, Texas 78701

(512) 474-7677 Telephone

(512) 474-5306 Facsimile

Charles@rosslawpc.com

s/ Charles L. Scalise

Charles L. Scalise

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on this the 27th day of October, 2011, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system, which will send notification to the following:

Todd A. Prins
Prins Law Firm
4940 Broadway, Ste. 108
San Antonio, TX 78209

/s/ Charles L. Scalise
Charles L. Scalise